

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

**SUBJECT:** RCRA Inspection - DuPont, E.I., Inc. - Phila.  
PAD 00 231 1884

**DATE:** JAN 6 1983

**FROM:** William L. Walsh  
Environmental Protection Assistant (3AW22) *WLW*

**TO:** File

**THRU:** Abraham Ferdas *AMC*  
*for* Chief, Air & RCRA Compliance Section (3AW22)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street  
Norristown, PA 19401  
215 631-2420



December 2, 1982

Ms. Helen Wooley  
E.I. DuPont de Nemours and Company, Inc.  
3500 Grays Ferry Avenue  
Philadelphia, PA 19146

Re: Hazardous Waste Inspection  
November 23, 1982

Dear Ms. Wooley:

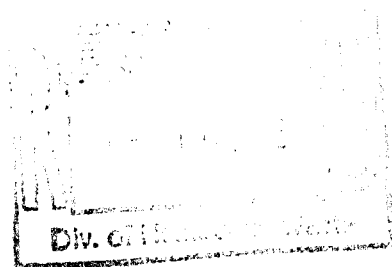
This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.263(c)(8)(iv) -Hazardous waste shipments were made without a copy of the HWT license being in the vehicle, as required. Discontinue transporting hazardous wastes without a license.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.



If you have any questions concerning this matter, please feel free to contact me at 565-1687.

Very truly yours,

ROBERT ZANG  
Solid Waste Specialist

cc: B. Beitler  
Division of Hazardous Waste ✓  
Re JA587

HAZARDOUS WASTE INSPECTION REPORT  
Transporters - Part A

DEC 1 1982

12-1-82  
Date of inspection 11/23/82 Time start 10<sup>30</sup> Time finish 11<sup>30</sup>

Name of inspector Robert Zang

Company name E.I. Du Pont de Nemours & Co., Inc.

Location 3500 Grays Ferry Ave.

County Phila Municipality Phila

Identification number PAD 002 311 884

Name of responsible official Ms. Helen Woolley

Title Safety Coordinator

Mailing address 3500 Grays Ferry Ave., Phila., PA - 19146

Area code and phone no. 215-339-6561

Name of person interviewed Same

Title "

Mailing address (if different from above) Same

Area code and phone no. "

1. a. PA hazardous waste transporter (HWT) license number PA-AH084

b. Expiration date 6/9/84

2. Hazardous waste handling: ☐ N/A

a. ☐ Blending, ☐ mixing

b. ☒ Storage, ☐ treatment, ☐ disposal

c. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

3. Does the transporter generate hazardous wastes? ☒ Yes ☐ No

4. Types of hazardous waste produced by Hazardous Waste Number:

D001-3, D007-9, D999 P012, P022

F003, F005 U002, U008, U009, U108, U113, U122

U154, U162, U196, U213

5. Are hazardous wastes transported into the Commonwealth from abroad? ☐ Yes ☒ No

(1 hr.)

Du Pont

## Non-Compliance item:

- (1) HWT license was not received by Du Pont for their station wagon. Obtain license before the vehicle is used again, or obtain a license for only this site prior to its use.

CORRECT ABOVE ITEM BY DEC. 15, 1982

(for obtaining the license)

CORRECT ABOVE ITEM IMMEDIATELY

(for transporting hazardous wastes without a license on board the vehicle)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. Findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Helen L. Worley Date 11/23/82  
Inspector (signature) Robert Zeng Date 11/23/82

SUBJECT: RCRA Inspection - E.I. DuPont de Nemours & Co. - Phila., Pa.  
PAD 002311884

DATE:

FROM: *gk* Gregory A. Koltonuk, [REDACTED]  
RCRA Enforcement Section (3HW) <sup>15</sup>

To: File

Thru: *Vicky Binetti* <sup>Mr 11/1/88</sup> CHIEF - RCRA Enforcement Section, 3HW 15

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.

F-waste

EPA Region III  
Greg R. KeltchHazardous Waste Inspection Report  
Generators - Part A

Date of inspection 9/9/88 Time start 9:30 A.M. Time finish 12:00 Noon  
 Name of inspector Bonnie Scully  
 Company, installation name E.I. DuPont De Nemours & Company Inc. / Marshall Labs  
 Location 3500 Grays Ferry Avenue  
 County Philadelphia Municipality Philadelphia  
 Identification number PAD002311884  
 Name of responsible official John G. Weldon  
 Title Safety Supervisor  
 Mailing address 3500 Grays Ferry Avenue  
 Area code and telephone number 215-339-6629  
 Name of person interviewed Same  
 Title \_\_\_\_\_  
 Mailing address (if different from above) Same  
 Area code and telephone number \_\_\_\_\_

## 1. Current waste handling method:

- |                                                 |                                     |                                              |                                              |                                  |
|-------------------------------------------------|-------------------------------------|----------------------------------------------|----------------------------------------------|----------------------------------|
| a. <input checked="" type="checkbox"/> On-site  | <input type="checkbox"/> treatment, | <input checked="" type="checkbox"/> storage, | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. <input type="checkbox"/> On-site             | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,              | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage,            | <input checked="" type="checkbox"/> disposal |                                  |
| d. <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,       | <input type="checkbox"/> reuse,              | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

## 2. Amount of hazardous waste produced:

- a. ~ 41,000 lbs / ~~yr~~ mo. kg./mo.  
 b. ~ 500,000 lbs / kg./yr.

## 3. Types of hazardous waste produced by Hazardous Waste Number:

D001, D002, D003, D007, D008, F002, F003, F005, U188, U009, U008  
and other waste streams. Facility is a Research Laboratory

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

Hazardous Waste Inspection Report  
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	Chapter Citation
Status				REQUIREMENT			75.262
1	2	3	4				
✓				Hazardous waste determination, copies available			(b)
✓				Identification number			(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters			(c)(4)
	✓			Authorization received from TSD facility for wastes shipped off-site			(d)
✓				PA manifest used for intrastate shipments			(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments			(e)(3)
✓				Manifests filled out properly and completely			(e)(7)
✓				Manifests routed properly and within time limits (7 days)			(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages			(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT			(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label			(f)(1)(iii)
✓				Placards offered to transporter			(f)(2)
✓				Wastes accumulated on-site for less than 90 days			(g)(1)(i)
✓				Wastes stored in proper containers and properly marked and labeled			(g)(1)(ii)
✓				Containers managed in accordance with 75.265(q)(1)–(9)			(g)(1)(iii)
✓				Containers clearly marked with accumulation date and visible for inspection			(g)(1)(iv)
✓				Records retained at designated location for 20 years			(h)
✓				Quarterly reports submitted to the Department			(i)
✓				Exception reporting procedures followed			(j)
✓				Hazardous waste disposal plan, if required			(l)
✓				Spill reporting procedures followed			(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented			(m)(5)
	✓			Special requirements followed for international shipments			(o)
✓				On the job or classroom personnel training program (75.265(f))			(g)(1)(6)
✓				Drum accumulation area inspected weekly as per 75.265(q)(5)			(g)(1)(iii)



Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 9/9/88 Identification Number PAD00231884  
Company, Installation Name E.I. Du Pont De Nemours & Company, Inc./Marshall Labs  
County Philadelphia Municipality Philadelphia

On this date Mark Bonenberger, Waste Management Specialist and myself, Bonnie Scully, Waste Management Specialist Trainee conducted an inspection of this facility. We toured the laboratories, waste storage areas, raw material storage area and processing areas. No violations were observed at this time.

Comments: All hazardous <sup>and non-hazardous</sup> material accepted from sites in New Jersey on 12/7/87 and 12/15/87 have been manifested and shipped out 5/18/88 (PAB 5074064) and 6/1/88 (PAB 5074053). Empty <sup>solvage</sup> drums remain on-site outside hazardous waste storage building. Enclosed are manifests from those shipments.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

John G. Weldon

Date

9/9/88

Inspector (signature)

Bonnie J. Scully

Date

9/9/88Mark Bonenberger 9/9/88

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES**  
**Bureau of Waste Management**  
P. O. Box 2063  
Harrisburg, PA 17120

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)  
Form Approved. OMB No. 2050-0039 Expires 9-30-88

ER-SWM-51:REV. 10/86

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>P.A.D.0.0.2.3.1.1.8.8.4</b>		Manifest Document No. <b>0.0.0.2.2</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.																			
3. Generator's Name and Mailing Address <b>E.I. DUPONT MARSHALL RD LABORATORY 3500 GRAYS FERRY AVE. PHILADELPHIA, PA. 19146</b>						A. State Manifest Document Number <b>PAB 5074064</b>																					
4. Generator's Phone (215) 339-6629						B. State Gen. ID <b>PA-AH</b>																					
5. Transporter 1 Company Name <b>ROSS TRANSPORTATION SERVICE</b>						C. State Trans. ID <b>0.1.3.3</b>																					
6. US EPA ID Number <b>OH D9.8.0.6.1.4.3.7.4</b>						D. Transporter's Phone (216) 748-2171																					
7. Transporter 2 Company Name						E. State Trans. ID <b>PA-AH</b>																					
8. US EPA ID Number						F. Transporter's Phone (216) 748-2171																					
9. Designated Facility Name and Site Address <b>ROSS INCINERATION SERVICES 394 GILES ROAD GRAFTON, OHIO 44044</b>						G. State Facility's ID <b>Not Required</b>																					
10. US EPA ID Number <b>OH D0.4.8.4.1.5.6.6.5</b>						H. Facility's Phone (216) 748-2171																					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.															
a. <b>RQ HAZARDOUS WASTE SOLID N.O.S. ORM-E NA9189 (D007 D008) CONTAINS CHROMIUM &amp; LEAD</b>						No.		Type																			
						1		D.M.		93.50		P		D 0 0 7 D.0.0.8													
						.		.		.		.		.													
						.		.		.		.		.													
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code)						K. Handling Codes for Wastes Listed Above																					
<table border="0" style="width:100%;"> <tr> <td style="width:25%;">Haz. Code</td> <td style="width:25%;">Physical State</td> <td style="width:25%;">Haz. Code</td> <td style="width:25%;">Physical State</td> </tr> <tr> <td>a. <b>E</b></td> <td><b>S</b></td> <td>c. <b></b></td> <td><b></b></td> </tr> <tr> <td>b. <b></b></td> <td><b></b></td> <td>d. <b></b></td> <td><b></b></td> </tr> </table>						Haz. Code	Physical State	Haz. Code	Physical State	a. <b>E</b>	<b>S</b>	c. <b></b>	<b></b>	b. <b></b>	<b></b>	d. <b></b>	<b></b>	<table border="0" style="width:100%;"> <tr> <td style="width:50%;">a.</td> <td style="width:50%;">c.</td> </tr> <tr> <td>b.</td> <td>d.</td> </tr> </table>						a.	c.	b.	d.
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a.	c.																										
b.	d.																										
15. Special Handling Instructions and Additional Information <b>HAZARDOUS MATERIALS (A) WPS 22070 DRUMS SHIPPED IN 85 GAL. SALVAGE DRUMS B/L # DQCF 35812 SEAL# OWD245011</b>																											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																											
Printed/Typed Name <b>JOHN G. WELDON</b>						Signature <i>John G. Weldon</i>		Month Day Year <b>05/18/88</b>																			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>George Brinegar</i>		Month Day Year <b>05/18/88</b>																			
Printed/Typed Name <b>George Brinegar</b>						Signature <i>George Brinegar</i>		Month Day Year <b>05/18/88</b>																			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Month Day Year																			
Printed/Typed Name						Signature		Month Day Year																			
19. Discrepancy Indication Space																											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																											
Printed/Typed Name <b>Nicholas T. Pokosz</b>						Signature <i>Nicholas T. Pokosz</i>		Month Day Year <b>05/20/88</b>																			

GENERATOR

TRANSPORTER

FACILITY

PAB 5074064



## PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 2063

Harrisburg, PA 17120

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-88

ER-SWM-51:REV. 10/86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P A D 0 0 2 3 1 1 8 . 8 . 4		Manifest Document No. 0 0 0 2 4		2. Page 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.					
3. Generator's Name and Mailing Address E.I. DUPONT 3500 GRAYS FERRY AVE. MARSHALL R&D LABORATORY PHILADELPHIA, PA. 19146						A. State Manifest Document Number PAB 5074053							
4. Generator's Phone ( 215 ) 339-6629						B. State Gen. ID SAME							
5. Transporter 1 Company Name ROSS TRANSPORTATION SERVICE						C. State Trans. ID PA-AH 0 1 3 3							
6. US EPA ID Number 0 8 D 9 8 0 6 1 4 3 7 4						D. Transporter's Phone ( )							
7. Transporter 2 Company Name						E. State Trans. ID PA-AH 0 1 3 3							
8. US EPA ID Number						F. Transporter's Phone ( 216 ) 748-2171							
9. Designated Facility Name and Site Address ROSS INCINERATION SERVICES 394 GILES ROAD GRAFTON, OHIO 44044						G. State Facility's ID Not Required							
10. US EPA ID Number 0 8 D 0 4 8 4 1 5 6 6 5						H. Facility's Phone ( 216 ) 748-2171							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
						No. Type							
a. RQ HAZARDOUS WASTE SOLID N.O.S. ORM-E NA9189 (D007 D008) CONTAINS CHROMIUM & LEAD						2 D.M		1 0 0 0		P		D 0 0 7 D 0 0 8	
b. RQ WASTE PAINT E.P.A. IGNITABILITY FLAMMABLE LIQUID UN1263 (D001)						3 1 D.M		1 5 5 0 0		P		D 0 0 1	
c. NON-HAZARDOUS SOLID WASTE (NON REGULATED MATERIAL)						3 7 D.M		1 8 5 0 0		P		N O N E	
d.													
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)						K. Handling Codes for Wastes Listed Above							
Haz. Code Physical State						Haz. Code Physical State							
a. F S						c.							
b. I L						d.							
15. Special Handling Instructions and Additional Information HAZARDOUS MATERIALS (A) WPS 22070 { DRUM SHIPPED IN 85 GAL. SALVAGE DRUM NO.69 B/L #DQCF 35910 (B) WPS 22912 DRUM NO.26 NOT IN A SALVAGE DRUM SEAL # OWD245032 (C) WPS 32684 DRUMS SHIPPED IN 85 GAL. SALVAGE DRUMS													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford													
Printed/Typed Name JOHN G. WELDON						Signature John G. Weldon						Month Day Year 06 01 88	
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Ronald Jones						Signature Ronald Jones						Month Day Year 06 01 88	
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Nicholas T. Petkosz						Signature Nicholas T. Petkosz						Month Day Year 06 02 88	

1988 WASTE MANAGEMENT PLAN REQUIRING AUTHORIZATION

PLANT SITE: Marshall R&D Laboratory

<u>WASTE NUMBER</u>	<u>DESCRIPTION</u>	<u>METHOD OF DISPOSAL</u>	<u>TONS</u>
ML-001	RQ Waste Paint, Flammable Liquid UN1263 (E.P.A. D001)	Incineration	198
ML-003	RQ Hazardous Waste Solid N.O.S. ORM-E NA9189 (Solid Paint & Pigment Waste) (E.P.A. D007, D008)	Incineration	43
ML-005	(MLW) Special Non Aqueous Waste (E.P.A. D001 D002 D003)	Incineration	4
ML-006	RQ Waste Combustible Liquid N.O.S. Combustible Liquid NA 1993 (E.P.A. D001) Aluminum Paste	Incineration	2

1987 WASTE MANAGEMENT PLAN REQUIRING AUTHORIZATIONPLANT SITE: MARSHALL R&D LABORATORY

<u>WASTE NUMBER</u>	<u>DESCRIPTION</u>	<u>METHOD OF DISPOSAL</u>	<u>TONS</u>
ML-001	WASTE PAINT LIQUID (EPA-D-001)	INCINERATION	150
ML-002	AQUEOUS (EPA-D-007, D-008)	WASTEWATER TREATMENT	80
ML-003	HAZARDOUS WASTE SOLID (SOLID PAINT WASTE & PIGMENT WASTE) (EPA-D-007, D-008)	INCINERATION	81
ML-004	SMALL CONTAINERS OF REACTIVE & TOXIC WASTE (EPA-D-001, D-002, D-003, F-005)	INCINERATION	3
ML-005	(MLW) SPECIAL NON-AQUEOUS WASTE (EPA-D-001, D-002, D-003)	INCINERATION	5
ML-006	HAZARDOUS WASTE LIQUID N.O.S. (ALUMINUM CONTAINING AQUEOUS PAINT) (EPA-D-003)	INCINERATION	1
ML-007	WASTE PAINT LIQUID CONTAINING ALUMINUM PASTE (EPA-D-001)	INCINERATION	1

HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part

DEC 1 1982

Date of inspection 11/23/82 Time start 900 Time finish 1030  
Name of inspector Robert Zang  
Company, installation name E.I. Du Pont de Nemours & Co., Inc.  
Location 3500 Grays Ferry Ave.  
County Phila. Municipality Phila.  
Identification number PAD002 311884  
Name of responsible official Ms. Helen Woolley  
Title Safety Coordinator  
Mailing address 3500 Grays Ferry Ave., Phila., PA - 19146  
Area code and phone no. 215-339-6561  
Name of person interviewed Same  
Title "  
Mailing address (if different from above) Same  
Area code and phone no. "

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☒ containers, ☐ tanks, ☐ surface impoundments, ☐ waste pile  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

D001-3, D007-9, D999

F003, F005

P012, P022

U002, U009, U108, U008, U113,

U154, U162, U196, U213

4. Are hazardous wastes transported off-site by the facility? ☒ Yes ☐ No

↓  
Lic. # PA-AHA084  
I, C, R, E, H, T, L, S, G  
Expires 6/9/84

1 1/2 hrs.

HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Du Pont

non-compliance item

- (1) PPC Plan has a number of deficiencies.

CORRECT ABOVE ITEM BY DEC. 15, 1982

WITHIN 2 MONTHS OF RECEIPT OF DER LETTER

Notes = (1) Solid Waste Mgt. has completed its review of the plan. A review letter may be sent in the near future by the Bureau of Waste Quality Mgt. if they have completed their review of the plan.

- (2) Du Pont does not plan on submitting its Part B application for storage, and will be undergoing closure in the near future.

\* Delete 12/15/82 correction date noted on generator inspection report dated 11/15/82.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Helena L. Woolley

Date

11/23/82

Inspector (signature)

Robert J. Jurek

Date

11/23/82

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

11-26-82

Date of inspection 11/15/82 Time start 8<sup>30</sup> Time finish 11<sup>30</sup>  
Name of inspector Robert Zang  
Company, installation name E.I. Du Pont de Nemours & Co., Inc.  
Location 3500 Grays Ferry Ave.  
County Phila. Municipality Phila  
Identification number PAD002311884  
Name of responsible official Ms. Helen Woolley  
Title Safety Coordinator  
Mailing address 3500 Grays Ferry Ave., Phila., PA - 19146  
Area code and phone no. 215-339-6561  
Name of person interviewed Judith E. Oletz  
Title Industrial Hygiene Coordinator  
Mailing address (if different from above) same  
Area code and phone no. 11

1. Current waste handling method:

- a. ☒ On-site ☐ treatment ☒ storage, ☐ disposal  
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal  
d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

a. 41,666 kg./mo.  
b. 500,000 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

D001-3, D007-9, D999  
F003, F005

P012, P022  
U009, U002, U108, U113, U122,  
U154, U162, U196, U213

4. Are hazardous wastes transported off-site by the generator? ☒ Yes ☐ No

3 Louis



HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

DuPont

Non-compliance items:

- (1) PLC Plan has a number of deficiencies, according to Dennis Oenshaw, BSWM Engineer.
- (2) Plymouth Transport, Inc. was used during the 2nd and 3rd quarters of 1982. This hauler is not licensed for EP toxic liquids. They are licensed for EP toxic solids and toxic (T) solids only.

Berg Electronics Div. is not licensed to transport EP toxic (E) or Acute Hazardous (H) wastes. This hauler was used for ~~the~~ shipment of Carbon disulfide (P022) Hazardous waste during both 2nd and 3rd quarters of 1982.

Note: Berg Electronics Div. is not licensed for "E" or "H" wastes. Refer to p. 4 of 3rd Quarterly Report.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Julius E. O'Leary

Date 11/15/82

Inspector (signature) Robert Zang

Date 11/15/82

Du Pont

non-compliance items:

- (3) Units of gallons ("G") were used for the second quarterly report (1982), when a weight unit should have been used. Submit a revised report to Harrisburg with a new page 1.

NOTE = Use proper conversion factor for making these revisions.

- (4) There are no weight ~~units~~ amounts for the "hazardous waste solid N.O.S. listed on the 4/13/82 shipment to CECOS (OH) — on MDN PAA1163956. Ascertain this weight, if possible, and incorporate the figure in yr records.

CORRECT ITEM 1 BY DECEMBER 15, 1982

CORRECT ITEM 2-4 BY NOVEMBER 30, 1982

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Person Interviewed (signature) Judith E. (J) [Signature] Date 11/15/82  
Inspector (signature) Robert Zang Date 11/15/82

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106**

**SUBJECT:** RCRA Inspection - E.I. DuPont PAD 00 231 1884

**DATE:** OCT 29 1982

**FROM:** William L. Walsh  
Environmental Protection Assistant (3AW22) *W.L.W.*

**TO:** File

**THRU:** Abraham Ferdas *AK*  
Chief, Air & RCRA Compliance Section (3AW22)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.

# RECORD OF COMMUNICATION

☒ PHONE CALL    ☐ DISCUSSION    ☒ FIELD TRIP    ☐ CONFERENCE  
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: ROB ZANG  
PA DER (215) 565-1687

FROM: BILL WALSH  
RCRA COMPLIANCE

DATE 10-19-82  
TIME 3:30 PM

SUBJECT follow up on 5/4/82 inspection of E.I. DuPont (PAD 00 231 1884)

SUMMARY OF COMMUNICATION  
I asked Mr. Zang if DuPont had corrected the violations found during his inspection & cited in his 6/17/82 letter. He said that DuPont responded with a letter on 6/23/82 explaining how they would come into compliance. Mr. Zang then called the facility to say that he agreed with their solutions to the problems. He added that he will reinspect the site within the next 2 weeks.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

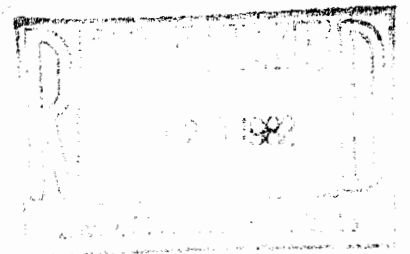
INFORMATION COPIES

TO:

Department of Environmental Resources  
1375 New Hope Street  
Morristown, PA 19401  
215 631-2420

June 17, 1982

Ms. Helen Woolley  
E.I. DuPont de Nemours and Co., Inc.  
3500 Grays Ferry Avenue  
Philadelphia, PA 19146



Re: Hazardous Waste Inspection  
May 4, 1982

Dear Ms. Woolley:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

75.262(f)(1)(iii) - The Pennsylvania label which is being used makes no mention of Pennsylvania laws, DNR, and the DNR emergency telephone number.

75.262(g)(1)(iv) - Accumulation dates were not written on hazardous waste drums.

<sup>75.265</sup>  
75.262(h)(5) and (i) - the PPC plan is not fully developed, organized and written. The PPC plan is to be a single entity, replacing but encompassing all previous EPA and DNR contingency plans, and must satisfy both solid waste and water quality requirements.

75.265(k) - A written operating record must be developed and written.

75.265(r)(3) and (s)(5) - Diligent inspections of the hazardous waste tanks are done sporadically. An inspection log must be developed and used for daily inspections of these tanks. Refer to 75.265(e)(5) for the inspection log information required.

75.263(h)(2) - The station wagon used to transport hazardous wastes from the Philadelphia Marshall Laboratories to another DuPont site does not have a suitable means of communication for summoning aid in an emergency, and has no eyewash apparatus on board.

Ms. Helen Wbolley

June 17, 1982

- 2 -

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 565-1687.

Very truly yours,

ROBERT ZANG

Solid Waste Specialist

cc: B. Beitler

Division of Hazardous Waste ✓

Re Y512

HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

6-11-82

Date of inspection 5/4/82 Time start 1:30 Time finish 4:00  
Name of inspector Robert Zang  
Company, installation name E. I. Du Pont de Nemours & Co., Inc.  
Location 3500 Grays Ferry Ave.  
County Phila Municipality Phila.  
Identification number PAD002 311 884  
Name of responsible official Mrs. Helen Woolley  
Title Safety Coordinator  
Mailing address 3500 Grays Ferry Ave., Phila., PA - 19146  
Area code and phone no. 215 - 339 - 6561  
Name of person interviewed same  
Title "  
Mailing address (if different from above) same  
Area code and phone no. "

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☒ Storage - ☒ containers, ☒ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☒ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

D001-3	F003	P012	U009	U108	U122	U162	U213
D007-9	F005	P022	U002	U113	U154	U196	
D999							

4. Are hazardous wastes transported off-site by the facility? ☒ Yes ☐ No

De Pont

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

3	4	REQUIREMENT	CHAPTER CITATION
			75.265
✓		Part A permit application submitted	(a) (2), (z)
✓		Identification number	(b)
✓		Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department	(b) (1)
✓		Waste streams not covered by permit approved by the Department before acceptance	(c) (1)
✓		Chemical and physical analyses repeated as required	(c) (1)
✓		All waste shipments inspected and sampled	(c) (2)
✓		Waste analysis plan on-site	(c) (3)
✓		24 hr. surveillance at active portion	(d) (2) (i)
✓		Artificial barrier at active portion	(d) (2) (ii)
✓		Proper signs posted and legible at a distance of at least 25 ft.	(d) (3)
✓		Inspection schedule on-site	(e) (2)
✓		Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction	(e) (4)
✓		Immediate remedial action taken where a hazard is imminent or has already occurred <i>NONE SO FAR</i>	(e) (4)
✓		On the job or classroom personnel training program	(f)
✓		Records retained for each employee at facility of training, job title, and job description	(f) (6), (
✓		Ignitable or reactive wastes separated from source of ignition or reaction	(g) (1)
✓		No smoking signs displayed where there are hazards from ignitable or reactive wastes <i>DESIGNATED AREAS ONLY</i>	(g) (1)
✓		Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	(g) (2)
✓		Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel	(h) (2) (i)
✓		Facility equipped with a device for summoning outside emergency assistance	(h) (2) (i)
✓		Facility equipped with fire control, spill control, and decontamination equipment	(h) (2) (i)
✓		Facility equipped with water at adequate volume and pressure to supply fire control equipment	(h) (2) (i)
✓		Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained.	(h) (3)
✓		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	(h) (6)
✓		Contingency plan on-site and implemented <i>PLAN INCOMPLETE/NOT FULLY DEVELOPED</i>	(i) (1)
✓		Contingency plan describes action taken by personnel in the event of an emergency	(i) (3)
✓		Contingency plan describes arrangements agreed to for initial emergency response by fire department, hospital, contractors, etc.	(i) (5)



# HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PA B General p.2.

*du Pont*

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
✓				Contingency plan contains an up-to-date list of names, <u>addresses</u> and phone numbers of all persons qualified to act as emergency coordinator. <u>ADDRESSES</u>	(i) (6)
✓				Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item <u>NEEDS UPDATING</u>	(i) (7)
✓				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i) (8)
✓				One employee designated as the primary emergency coordinator either on the premises or on call.	(i) (1)
	✓			Facility accepting only PA manifests	(j)
	✓			Manifests properly completed and routed within time limits (24 hrs.)	(j) (2)
	✓			Manifest discrepancies resolved or reported within time limits	(j) (1)
✓				Written operating record maintained on the premises	(k)
✓				Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k) (2)
✓				Written operating record contains location and quantity of each hazardous waste	(k) (2)
✓				Written operating record contains results of waste analyses and treatability tests <u>SOME RESULTS NOT ON-SITE (AT OTHER DUPONT SITES)</u>	(k) (2)
	✓			Written operating record contains reports and details of all incidents <u>NONE SO FAR</u>	(k) (2)
✓				Written operating record contains records and results of all inspections	(k) (2)
✓				Written operating record contains required monitoring, testing, and analytical data	(k) (2)
	✓			Written operating record contains closure and post-closure cost estimates	(k) (2)
	✓			All records retained on premises and available for inspection	(l)
	✓			Quarterly reports submitted to the Department	(m)
	✓			Emissions, discharges, fires, explosions, and groundwater contamination reported as required <u>NONE SO FAR</u>	(m) (1)
	✓			Groundwater monitoring wells located at approved sites	(n) (1)
	✓			Adequate protection of groundwater monitoring wells	(n) (1)
	✓			Groundwater sampling and analysis plan on the premises	(n) (1)
	✓			Groundwater quality assessment and abatement outline on the premises	(n) (1)
✓				Closure plan on the premises and up-to-date	(o) (1)
	✓			Post-closure plan on the premises and up-to-date	(o) (1)
✓				Annual closure cost estimate on the premises and up-to-date	(p) (1)
	✓			Annual post-closure cost estimate on the premises and up-to-date	(p) (1)

De Pont

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
2	3	4			
✓				Containers managed to prevent leaks and spills	(q) (1), (
✓				Containers are compatible with waste stored.	(q) (2)
✓				Containers are closed during storage	(q) (3)
✓				Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
✓				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
✓				Satisfactory procedures followed for handling incompatible wastes.	(q) (7),
✓				Incompatible wastes separated or protected from other materials.	(q) (9)
✓				Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)
✓				Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
✓				Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
	✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard. <i>NO OPEN TANKS</i>	(r) (4)
	✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
	✓			Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
✓				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
✓				Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r) (7)
✓				Discharge control equipment inspected once each operating day.	(r) (8)
✓				Monitoring equipment data inspected once each operating day.	(r) (8)
✓				Liquid level of tanks inspected once each operating day. <i>SPORADICALLY INSPECTED</i>	(r) (8)
✓				Construction materials of tanks inspected weekly.	(r) (8)
✓				Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8)
	✓			All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
✓				Placement of ignitable or reactive waste only with the Department's approval	(r) (10)
✓				Covered tanks in which ignitable or reactive waste is treated or stored meets MSDA buffer zone requirements.	(r) (11)
✓				Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (12)

HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Du Pont

non-compliance items =

- (1) PPC plan is not organized and fully developed
- (2) written operating record must be developed and used
- (3) written operating record must have copies of any off-site analytical records (i.e. - from other DuPont sites)
- (4) liquid level of hazardous waste tank only inspected sporadically. This must be done daily and logged in an inspection log

NOTE: (A) hazardous waste tank labeled "non-hazardous waste" and "hazardous waste"

CORRECT ITEM (1) BY JUNE 30, 1982

CORRECT ITEMS (2)-(4) BY MAY 30, 1982

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Interviewer (signature)

H. L. Woolley

Date

5/4/82

Inspector (signature)

Robert J. King

Date

5/4/82